IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO

EASTERN DIVISION

ANITA ARRINGTON-BEY, etc.,)

Plaintiff,)

v.) Case No. 1:14-CV-02514
) Judge Patricia A. Gaughan
THE CITY OF BEDFORD HEIGHTS,)
et al.,)

Defendants.)

THE DEPOSITION OF CYNTHIA LEE
THURSDAY, APRIL 16, 2015

The deposition of CYNTHIA LEE, a witness, called for examination by the Plaintiffs, under the Federal Rules of Civil Procedure, taken before me, Kristine M. Esber, a Notary Public in and for the State of Ohio, pursuant to notice, at the offices of Friedman & Gilbert, 55 Public Square, Suite 1055, Cleveland, Ohio, commencing at 1:07 p.m., the day and date above set forth.

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EXHIBIT

Section 1.15

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- 1 Q. So because it happens often that means it's
- 2 | normal behavior?
- 3 A. Oh, I wouldn't say that.
- 4 | Q. If you saw that outside the jail with somebody
- 5 breaking paint or whatever at Lowe's who worked there
- 6 and somebody's talking nonstop and talking nonsense,
- 7 | you put them in a segregation cell and he's dancing and
- 8 he's talking crazy with you --
- 9 A. He wasn't talking crazy with me.
- 10 Q. What did he say to you?
- 11 A. He said, you like that, don't you.
- 12 Q. What do you mean you like that?
- 13 A. The way he was dancing and taking his belt off.
- 14 Q. Okay. And was he ranting?
- 15 **A**. No.
- 16 Q. Did you see him kick the cell door?
- 17 A. I heard him kick it.
- 18 | Q. So you knew he was kicking the cell door, right?
- 19 A. Yeah. I heard him kick it.
- 20 | Q. Did he make remarks about white officers?
- 21 A. Not that I heard.
- 22 Q. Did you feed him?
- 23 A. No.
- 24 Q. Do you know how he got his meals?
- 25 **A.** No.

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- 1 | Q. What did you or anyone do in response to him
- 2 | kicking the cell door?
- A. We would ask him to stop if he was kicking the
- 4 | the cell door.
- 5 | Q. Okay. And at this time you had no idea that he
- 6 had any kind of medications, psychiatric or otherwise,
- 7 on his person?
- 8 A. Well, when he was searched he had pills I think.
- 9 I don't know how many it was. Probably three or four
- 10 | pills on him.
- 11 | Q. You don't know what those pills were for, did
- 12 you?
- 13 A. No.
- 14 | Q. Did you ask him?
- 15 A. No. I didn't ask him.
- 16 Q. Okay. And that's an important piece of
- 17 | information that you need to know concerning the
- 18 | medical and mental health situation of a person when
- 19 they're brought in from the outside into the jail,
- 20 right?
- 21 A. Yes.
- 22 Q. And you had these pills in the jail's possession
- 23 while he's in the segregation room kicking the door?
- 24 A. Okay.
- 25 Q. Correct; is that right?